

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In Re:) Case No.: 20-16024-SLM
Ian M. Kunesch)
)
)
) Chapter 13
)
)
Social Security No.:)

NOTICE OF OBJECTION

The undersigned, GETLER, GOMES, & SUTTON, P.C., attorneys for Secured Creditor SB One Bank, the holder of a Mortgage on the debtor's premises at 723 Limecrest Road, Newton, NJ and 214 Newton Sparta Road, Newton, NJ, hereby objects to the confirmation of the debtor's proposed and Modified Chapter 13 Plan as it is cramming down Secured Creditor's mortgage without a basis.

Furthermore, the Secured Creditor objects to that portion of the plan which essentially serves to strip off the Secured Creditor's mortgage lien. Even the debtor's own appraisal shows sufficient equity in the property to allow Secured Creditor's mortgage to remain.

In the event the debtor cures the provisions of the plan as objected to above, the undersigned will not appear at the Confirmation Hearing and the aforesaid objection should be deemed waived.

GETLER, GOMES, & SUTTON, P.C.
Attorneys for Secured Creditor
SB One Bank

/s/ Janine A. Getler

JANINE A. GETLER
MEMBER OF THE FIRM

Dated: July 23, 2020